

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
FEDERAL HOUSING FINANCE AGENCY,
:
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Plaintiff,
:
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v.
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:

11 Civ. 6189 (DLC)
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HSBC NORTH AMERICA HOLDINGS, INC., *et*
al.,
:
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Defendants.
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FEDERAL HOUSING FINANCE AGENCY,
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Plaintiff,
:
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v.
:
:

11 Civ. 6201 (DLC)
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NOMURA HOLDING AMERICA, INC., *et al.*,
:
:

Defendants.
:
:
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**NOTICE OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT
ON THE STATUTE OF LIMITATIONS**

PLEASE TAKE NOTICE that, upon the respective Declaration of Andrew R. Dunlap, Esq., and the exhibits attached thereto, FHFA's Statement of Uncontested Material Facts pursuant to Local Civil Rule 56.1, and the accompanying Plaintiff's Memorandum in Support of Its Motion for Partial Summary Judgment on the Statute of Limitations, dated August 25, 2014, Plaintiff, by its attorneys, Quinn Emanuel Urquhart & Sullivan, LLP, hereby moves this Court for an Order pursuant to Rule 56(a) of the Federal Rules of Civil Procedure granting partial summary judgment and barring as a matter of law the statute of limitations defense Defendants have pleaded under Section 13 of the Securities Act of 1933, 15 U.S.C. 77m, and under the

parallel provision of the D.C. Securities Act, D.C. Code § 31-5606.05(f)(2)(B), and for such other and further relief as the Court may deem just and proper.

DATED: New York, New York
August 25, 2014

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Philippe Z. Selendy

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Freddie Mac*